



COMER DISTRIBUTING COMPANY, INC.
110 CARMEL ROAD - P.O. BOX 10821
ROCK HILL, SOUTH CAROLINA 29731-0821

240481

DEPT. OF TRANSPORTATION
DOCKETS

2003 APR 22 A 9:2

NAME: Chip Comer
BUSINESS NAME: Comer Dist. Co., Inc.
ADDRESS: P.O. Box 10821
PHONE: 803 324 1180
DOCKET NUMBER: FMCSA-2002-12334-44

1. Please indicate your primary occupation(s) from the following list:

- | | |
|-------------------------------------------------------------------------|---------------------------------------------------------------------|
| <input type="checkbox"/> Truck Driver | <input checked="" type="checkbox"/> Owner-Operator |
| <input type="checkbox"/> Motor Coach / Bus Driver | <input type="checkbox"/> Fleet Manager / Owner |
| <input type="checkbox"/> Company Safety Director | <input type="checkbox"/> Transit System Administrator |
| <input type="checkbox"/> Commercial Driver Trainer | <input type="checkbox"/> Motor Carrier Insurance Provider |
| <input type="checkbox"/> Risk Assessment Specialist | <input type="checkbox"/> Labor Union Representative |
| <input type="checkbox"/> Motor Vehicle Admin. (State Driver's Licenses) | <input type="checkbox"/> Enforcement Officer (motor carrier safety) |
| <input type="checkbox"/> Public Interest Group | <input type="checkbox"/> Other |

2. Do you think a graduated commercial driver's license (GCDL) is needed?

- ☒ Yes ☐ No

3. Should issuance of a GCDL be linked to enrollment in a commercial driving training program?

- ☐ Yes ☒ No

4. Should the curricula of a commercial driver training program meet widely-endorsed standards for a student to be eligible to receive a GCDL while in training?

N/A

5. Approximately how many months/years of entry level training and experience should new drivers receive before "graduating" to an unrestricted CDL?

1-2 months

6. Should an applicant's past driving record be considered in issuing a GCDL?



Yes



No

7. How many of each of the following types of motor vehicle accidents and convictions within the past 12 months should cause an application to be denied a GCDL?



Passenger car or light truck motor vehicle accidents



Other convictions for motor vehicle traffic control violations



DUI/DWI convictions



Controlled substances convictions



Reckless driving convictions



Traffic violations and citations

8. Should penalties for drivers holding a GCDL, who have at-fault accidents or moving violations, be more severe than those for drivers with an unrestricted CDL?

N/A

9. How many months/years of passenger car or light truck driving experience should an applicant have before being issued a GCDL?

3

10. Which of the following restrictions should apply to entry level drivers operating under a GCDL?

- | | |
|-----------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> Reduced hours of service | <input type="checkbox"/> Other |
| <input checked="" type="checkbox"/> Limitations on equipment type (e.g., doubles/triples, tank vehicles, motor coaches, etc.) | <input checked="" type="checkbox"/> Limitations on types of cargo (e.g., hazardous materials, livestock, liquids, etc.) |
| <input type="checkbox"/> Limitations on weather and visibility conditions (e.g., ice, snow, fog, night driving) | <input type="checkbox"/> Limitations on geography or terrain features (e.g., mountains) |
| <input checked="" type="checkbox"/> Limitations on distance or types of highways (e.g., miles per day, Interstate highways, etc.) | |

11. Should a fully licensed CDL driver be required to accompany and observe a driver with a GCDL? If yes, for how many weeks/months/years?

☐ Yes

☒ No

12. What is the minimum age at which an applicant should be eligible to receive a graduated CDL?

18

13. Assuming that training requirements are met, what is the minimum age at which the holder of a graduated CDL should be eligible to graduate to an unrestricted CDL?

18

14. How much testing (knowledge and road test) should be given to GCDL holders prior to issuing an unrestricted CDL?

- | | |
|------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| <input type="checkbox"/> Single test to "graduate" to an unrestricted CDL | <input type="checkbox"/> Periodically while holding a GCDL until training is complete |
| <input checked="" type="checkbox"/> Initial test plus re-test at 1 year after receiving initial GCDL | <input type="checkbox"/> Other |
-

15. What other factors do you feel must be addressed in the implementation of a graduated CDL program?

If a graduated system was used then each level of the GCDL should be considered to be a "CDL", not just a piece of the whole picture.

16. What costs would you or your organization anticipate incurring if a GCDL program is implemented?

We feel our continued training of drivers is very costly to our company. Training of 2 months on average is not unusual. The driver may then move on to an "over the road" company in a very short time after our training period. This is a continuous process at our expense.

If this program changed to a GCDL our cost and time savings could be directed to more productive issues to help us grow.